

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA



**FILED**  
3-09-15  
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Application of San Diego Gas & Electric  
Company (U 902-E) for a Reasonableness  
Determination and Recovery of its 2014  
O&M and Non-O&M SONGS Costs.

Application 15-02-006  
(Filed January 30, 2015)

**PROTEST  
OF THE OFFICE OF RATEPAYER ADVOCATES**

Pursuant to Rule 2.6 of the Commission's Rules of Practice and Procedure, the Office of Ratepayer Advocates ("ORA") hereby protests the Application of San Diego Gas and Electric Company ("SDG&E") for a Commission Reasonableness Review for 2014 SONGS 2 & 3 Expenses ("Application").

**I. DISCUSSION**

In this application SDG&E seeks a reasonableness review of a subset of costs of the San Onofre Nuclear Generating Station ("SONGS") incurred in 2014 and requests recovery of those costs from SDG&E's Nuclear Decommission Trust ("Trust"). (Application, p.1) SDG&E's application is made in compliance with Commission Decision (D.) 14-11-040. ORA agrees with SDG&E that the issues in this proceeding are whether SDG&E's O&M, non-O&M and other 2014 costs are reasonable and whether SDG&E should be allowed to recover costs from the SDG&E Trust. (Application p.2) ORA agrees with SDG&E that this proceeding should be designated as ratesetting and that hearings will likely be necessary in this proceeding. (Application, p. 11).

ORA will review SDG&E's application and conduct an evaluation of reasonableness and an audit of the recorded 2014 numbers. Based on ORA's active involvement in the 2015 Sempra General Rate Case, ORA auditors will not be available until May 2015. Therefore ORA proposes the following schedule:

	SDG&E PROPOSED SCHEDULE	ORA PROPOSED SCHEDULE
Application Filed	January 30, 2015	
PHC		
ORA & Intervenor Testimony	July 1, 2015	August 7, 2015
Updated Application and Supplemental Testimony Submitted	TBD	
SDG&E Rebuttal	July 15, 2015	August 28, 2015
Hearings	Mid to late August, 2015	September 14-15, 2015, 2015
Opening Briefs	September 31, 2015	TBD
Reply Briefs	October 14, 2015	TBD
Proposed Decision Issued	November 14, 2015	TBD

Respectfully submitted,

/s/ GREGORY HEIDEN

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Gregory Heiden

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